

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS

PAUL HILLS,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 1:08-cv-3329
	)	
BAXTER HEALTHCARE CORP.,	)	
BAXTER INTERNATIONAL, INC. and	)	
WYETH SUBSIDIARY ILLINOIS	)	
CORPORATION F/K/A SCIENTIFIC	)	
PROTEIN LABORATORIES,	)	
	)	
Defendants.	)	

**MOTION TO REMAND TO STATE COURT  
PURSUANT TO 28 U.S.C. § 1447**

Plaintiff, PAUL HILLS, through undersigned counsel, respectfully moves this Court pursuant to 28 USC 1447(c ) to enter an order remanding the above-entitled action to the Circuit Court of Cook County, State of Illinois, for the reasons set forth in the Plaintiff's Memorandum of Law. Plaintiff's complaint is not based upon federal law. Instead, plaintiff's cause of action against Defendants is solely brought under state law, namely 740 ILCS 180 (2008) and 750 ILCS 65/15, as construed and applied by the courts of the State of Illinois.

Wherefore, plaintiff respectfully requests that this court remand this matter.

Dated this 19th day of June, 2008.

Respectfully submitted,

\_\_\_\_\_/s\_\_\_\_\_

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Defendants.	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on June 19<sup>th</sup>, 2008, I electronically filed **Plaintiff's Motion to Remand to State Court Pursuant to 28 U.S.C. § 1447 and Plaintiff's Memorandum in Support of Motion to Remand** with the Clerk of Court using the CM/ECF system which will send notification to such filing(s) to the following:

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Respectfully submitted,

s/ Devon C. Bruce  
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